IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

LAYNE DREXEL,)	
Plaintiff,)	
v.)	C.A. No.: 05-428 (JJF)
HARLEYSVILLE INSURANCE CO.,)	
Defendant)	

NOTICE OF RECORDS DEPOSITION

TO: Robert K. Beste, III, Esq. Smith Katzenstein & Furlow LLP 800 Delaware Avenue, 7th Floor P.O. Box 410 Wilmington, DE 19899

PLEASE TAKE NOTICE that the undersigned attorney will take the deposition of the below listed individuals at the offices of CASARINO, CHRISTMAN & SHALK, 800 N. King Street, Suite 200 Wilmington, Delaware on November 8, 2006 at 2:00 p.m.:

> Records Custodian* Wilmington Savings Fund Society 838 Market Street Wilmington, Delaware 19899

> > STEPHEN P. CASARINO, ESQUIRE CASARINO, CHRISTMAN & SHALK 800 N. King Street, Suite 200 P.O. Box 1276 Wilmington, DE 19899 Attorney for Defendant

DATE: October 3, 2006

cc: Records Custodian

Wilmington Savings Fund Society

*DUCES TECUM: to produce for inspection and copying check receipts of Wayne L. Drexel, 1910 Old Capitol Trial, Newark, DE, 19711, account no. 206196 131 the following documents: (1) copies of all cancelled checks dated June 1, 2004 through and including August 1, 2004; (2) copies of all cancelled checks numbered 4300 through 4365 and; (3) copies of check account statements for May, June, July, August and September 2004

Your appearance is waived if the records are received in the offices of NOTE: CASARINO, CHRISTMAN & SHALK by the date of the deposition.

CERTIFICATE OF SERVICE

I, STEPHEN P. CASARINO, Esq., hereby certify that I have caused to be deposited in the mailbox at 800 North King Street, Suite 200, Wilmington, DE 19801, on this 3rday of October, 2006, a true and correct copy of the attached Notice of Records Deposition to:

> Robert K. Beste, III, Esq. Smith Katzenstein & Furlow LLP 800 Delaware Avenue, 7th Floor P.O. Box 410 Wilmington, DE 19899

> > STEPHEN P. CASARINO, ESQUIRE CASARINO, CHRISTMAN & SHALK 800 N. King Street, Suite 200

P.O. Box 1276

Wilmington, DE 19899 Attorney for Defendant